

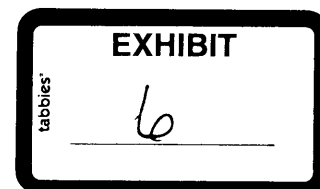
IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
SOUTHERN DIVISION

ASD SPECIALTY HEALTHCARE, INC.)	
)	
<i>Plaintiff,</i>)	
)	
vs.)	CASE NUMBER: 1:05-cv-591
)	
ONCOLOGY HEMATOLOGY)	
CENTERS OF ATLANTA, P.C., <i>et al.</i> ,)	
)	
<i>Defendants.</i>)	

RESPONSES OF DEFENDANTS
ONCOLOGY & HEMATOLOGY CENTERS OF ATLANTA, P.C.
AND LLOYD G. GEDDES, JR.
TO PLAINTIFF'S FIRST REQUESTS FOR ADMISSIONS

NOW COME ONCOLOGY & HEMATOLOGY CENTERS OF ATLANTA, P.C. and LLOYD
G. GEDDES, JR. and respond to plaintiff's First Requests for Admissions as follows:

1. Admitted.
2. Denied. The defendants say that the duties and obligations of Defendant Geddes are set out in the surety agreement between Geddes and Oncology Supply dated January 28, 2004.
3. Denied. The amount owed as of May 26, 2005 was \$155,028.90.
4. Admitted.
5. Denied. The principal balance as of April 3, 2006 was \$101,676.57 (see Oncology Supply statement dated April 3, 2006 attached hereto as Exhibit A). Moreover, this defendant has made three payments of \$20,000 each on July 15, 2005, April 15, 2005,



and August 31, 2005, for which the defendants have not been given credit. Copies of these payments totaling \$60,000 are attached hereto as Exhibit B.

6. Admitted.

7. Denied. These defendants admit, however, that Exhibit C is a true and correct copy of a proprietor guaranty, which document sets forth the duties and obligations of the parties.

8. Denied. See Exhibit B attached hereto and referenced in response to Request for Admissions Number 5.

9. Denied. See response to Request for Admissions Number 8.

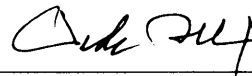
10. Admitted.

11. Admitted.

12. Denied. See Exhibits A and B attached to these defendants' response to Request for Admissions Number 5. The plaintiff has failed to give credit for payments made by or on behalf of the defendants.

13. Denied. These defendants have made payments totaling \$60,000 for which credit has not been given. These payments are referenced in response to these defendants' responses to Request for Admissions Number 5.

14. Admitted.



DAVID E. ALLRED
Attorney for Defendants
ONCOLOGY & HEMATOLOGY
CENTERS OF ATLANTA, P.C. and
LLOYD G. GEDDES, JR.

OF COUNSEL:

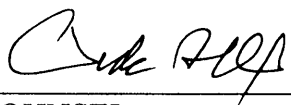
DAVID E. ALLRED, P.C.
Post Office Box 241594
Montgomery, Alabama 36124-1594
Telephone: (334) 396-9200
Facsimile: (334) 396-9977

CERTIFICATE OF SERVICE

I hereby certify that I have this 12th of April, 2006 filed the foregoing *Responses of Defendants Oncology & Hematology Centers of Atlanta, P.C. and Lloyd G. Geddes, Jr. to Plaintiff's First Requests for Admissions* by placing a copy of same in the United States Mail, first-class postage prepaid:

Heath A. Fite, Esq.
BURR & FORMAN, LLP
3100 Wachovia Tower
420 North 20th Street
Birmingham, Alabama 35203-5206

Morton R. Branzburg, Esq.
KLEHR, HARRISON, HARVEY, BRANZBURG & ELLERS
260 S. Broad Street
Philadelphia, Pennsylvania 19102



OF COUNSEL



www.oncologysupply.com

STATEMENT

Customer No.:

Page: 000049792

Date: 1

Business Partner Type: 04-03-2006

Line of Business:

Remit To:

Oncology Supply

Attn.: Accounting

P. O. Box 676554

Dallas, TX 75267-6554

(888) 877-8430 (Phone)

(334) 984-2448 (Fax)

Invoice To:

ONCOLOGY/HEMATOLOGY CTRS OF ATLANTA
465 WINN WAY SUITE 231
DECATUR, GA 30030

Ship To:

ONCOLOGY/HEMATOLOGY CTRS OF ATLANTA
465 WINN WAY SUITE 231
DECATUR, GA 30030

Document No.	Invoice Date	Reference/ PO Number	Due Date	Invoice Amount	Last Receipt	Amount Revd.	Invoice Balance
130 10706777	08-12-04		10-26-04	USD 1,418.15	05-25-05	290.30-	1,127.85
130 10709156	08-16-04		10-30-04	USD 9,151.19	07-18-05	5,607.74-	3,543.45
130 10730836	09-10-04		11-24-04	USD 2,647.15		0.00	2,647.15
130 10734486	09-14-04	maureen	11-28-04	USD 8,013.78		0.00	8,013.78
130 10740815	09-22-04	DASHA	12-06-04	USD 6,691.70		0.00	6,691.70
130 10742627	09-24-04		12-08-04	USD 340.55		0.00	340.55
130 10743149	09-24-04		12-08-04	USD 6,078.28		0.00	6,078.28
130 10743719	09-27-04		12-11-04	USD 6,311.95		0.00	6,311.95
30 10746388	09-29-04		12-13-04	USD 4,945.91		0.00	4,945.91
130 10748426	09-30-04		12-14-04	USD 122.10		0.00	122.10
130 10750068	10-04-04		12-18-04	USD 7,180.30		0.00	7,180.30
130 10750069	10-04-04		12-18-04	USD 5,153.94		0.00	5,153.94
130 10751408	10-05-04		12-19-04	USD 5,209.79		0.00	5,209.79
130 10751409	10-05-04		12-19-04	USD 1,424.85		0.00	1,424.85
130 10754920	10-08-04		12-22-04	USD 9,731.89		0.00	9,731.89
130 10756119	10-11-04		12-25-04	USD 5,115.94		0.00	5,115.94
130 10757380	10-12-04		12-26-04	USD 3,276.53		0.00	3,276.53
130 10761486	10-15-04		12-29-04	USD 5,667.18		0.00	5,667.18
130 10763808	10-19-04		01-02-05	USD 3,599.73		0.00	3,599.73
130 10766341	10-21-04		01-04-05	USD 3,909.11		0.00	3,909.11
130 10767155	10-22-04		01-05-05	USD 11,057.24		0.00	11,057.24
130 10768385	10-25-04		01-08-05	USD 529.43		0.00	529.43
CS3 10208822	09-15-05		09-15-05	USD -6,649.75	09-14-05	6,647.67	2.08
AGING ANALYSIS IN DAYS							101,676.57
TOTAL DUE⇒							
Current	1-30 Days	31-60 Days	61-90 Days	91-120 Days	Over 120 Days		
0.00	0.00	0.00	0.00	0.00	101,676.57		

000049792

A Subsidiary of Bcrgen Brunswick Corporation

EXHIBIT

A